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November 22, 2024

By ECF

Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**Re: Sarah Goolden v. Hamed Wardak
1:19 Civ. 06257 (ALC/VF)**

Dear Judge Figueredo:

We represent the defendant, Hamed Wardak (“Defendant”). We respectfully submit this letter to request a brief extension of the time period to complete the deposition of Defendant. Your Honor has ordered that the Defendant’s deposition must be completed on or before December 6, 2024 (Memo Endorsement, Docket # 218), and Plaintiff’s counsel filed a notice of deposition for December 6 (Docket # 220). Defendant is currently enrolled in rigorous higher education courses, including a course in Computer Organization & Systems at Stanford University, with final exams the week of December 9. We respectfully request a two-week extension of the time period for the deposition, to December 20, which will allow sufficient time for Defendant to prepare for and appear for the deposition without disruptive conflict with his full-time studies and exams. We have conferred with Plaintiff’s counsel, and Plaintiff objects to this request. We note that the brief extension would pose minimal or no prejudice to Plaintiff, and that to date both sides have been accommodating of reasonable scheduling requests of the other; for example, we were accommodating of Plaintiff’s requests regarding the scheduling of her deposition in May of this year.

We thank the Court for its consideration.

Respectfully submitted,
YANKWITT LLP

By: 
Benjamin Allee

Cc: All counsel (by ECF)